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1 2 3 4 5	Alan L. Martini, SB No. 77316 Marc G. Cowden, SB No. 169391 SHEUERMAN, MARTINI, TABARI, ZENERE & GARVIN A Professional Corporation 1033 Willow Street San Jose, California 95125 Telephone (408) 288-9700 Facsimile (408) 295-9900 Email: amartini@smtlaw.com mcowden@smtlaw.com
6	Attorneys for Defendants
7   8	CALIFÒRNIA FORENSIC MEDICAL GROUP, INC.; CHRISTINA KAUPP
9	UNITED STATES DISTRICT COURT
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA
11	SAN JOSE DIVISION
12	
13	ESTATE OF MARK VASQUEZ PAJAS, SR., Case No.: 16-cv-00945 BLF
14	et al.,  Plaintiffs,  STIPULATION FOR WAIVER OF COSTS  IN EXCHANGE FOR WAIVER OF RIGHT  TO APPEAL AND ORDER THEREON
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16	COUNTY OF MONTEREY et al.,
17	Defendants. )
18	DI COS POTE TE OF MARK WASOI IEZ DA LAS SD. deceased by and through
19	Plaintiffs ESTATE OF MARK VASQUEZ PAJAS, SR., deceased, by and through
20	ROSEMARY LOPEZ, as Administrator; ROSEMARY LOPEZ; YVETTE PAJAS; MARK PAJAS,
21	JR.; JANEL PAJAS; XAVIER PAJAS and Defendants, CALIFORNIA FORENSIC MEDICAL
22	GROUP, INC. and CHRISTINA KAUPP, by and through their counsel of record, hereby stipulate to
23	the terms and conditions on this stipulation and jointly request that the court enter its Order at the
24	end of this document.
25	WHEREAS, the Court entered Judgment in favor of Defendants CALIFORNIA FORENSIC
26	MEDICAL GROUP, INC. and CHRISTINA KAUPP and against Plaintiffs ESTATE OF MARK
27	VASQUEZ PAJAS, SR., deceased, by and through ROSEMARY LOPEZ, as Administrator,
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	Case No. 5:16-cv-00945 BLF - STIPULATION FOR WAIVER OF COSTS IN EXCHANGE FOR WAIVER OF RIGHT TO APPEAL AND ORDER
	THEREON

1	ROSEMARY LOPEZ; YVETTE PAJAS; MARK PAJAS, JR.; JANEL PAJAS; XAVIER PAJAS
2	on February 20, 2019; and
3	WHEREAS, Defendants filed their Bill of Costs on March 6, 2019; and
4	WHEREAS, Plaintiffs have a right to appeal the Court's Judgment before the Court of
5	Appeals.
6	THEREFORE, the parties agree as follows:
7	Plaintiffs agree to waive their right to all appealable issues arising in and from this action,
8	including but not limited to the February 20, 2019 Judgment in exchange for Defendants' waiver of
9	all claims for costs arising from this litigation, including those in their Bill of Costs filed March 6,
10	2019.
11	IT IS SO STIPULATED.
12	Dated: March 19, 2019 HADSELL STOMER & RENICK LLP
13	By:
14	Dan Stormer Lori Rifkin
15	Jordyn Bishop Shaleen Shanbhag
16	Attorneys for Plaintiffs
17	Dated: March 19, 2019 SHEUERMAN, MARTINI, TABARI, ZENERE & GARYIN
18	By: Alan Mass
19	Alán L. Martini Marc G. Cowden
20	Attorneys for Defendants CALIFORNIA FORENSIC
21	MEDICAL GROUP, INC. AND CHRISTINA KAUPP
22	ORDER
23	Upon good cause being shown as set forth in the stipulation of counsel for the parties, the
24	Court hereby adopts the stipulation.
25	PURSUANT TO STIPULATION, IT IS SO ORDERED.
26	Dated
27	BETH LABSON FREEMAN United States District Judge
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Case No. 5:16-cv-00945 BLF - STIPULATION FOR WAIVER OF COSTS IN EXCHANGE FOR WAIVER OF RIGHT TO APPEAL AND ORDER THEREON